

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

UNITED STATES OF AMERICA, ex rel. CAMERON JEHL,)	
)	
)	
Plaintiffs,)	
)	
v.)	No. 3:19-cv-091-NBB-JMV
)	
GGNSC SOUTHAVEN LLC D/B/A GOLDEN LIVING CENTER-SOUTHAVEN; GGNSC ADMINISTRATIVE SERVICES LLC D/B/A GOLDEN VENTURES; AND GGNSC CLINICAL SERVICES LLC D/B/A GOLDEN CLINICAL SERVICES,)	
)	
)	
Defendants.)	

Oral Argument Requested

**RELATOR’S RESPONSE IN OPPOSITION TO DEFENDANTS’ MOTION FOR AN
AWARD OF ATTORNEYS’ FEES AND OTHER EXPENSES**

Relator, Cameron Jehl, hereby submits his Response in Opposition to Defendants’ Motion for an Award of Attorneys’ Fees and Other Expenses (Docket 356).

In support of this Response, Mr. Jehl submits the following exhibits, which are attached to this Response:

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|------------------|---|
| Exhibit 1 | PACER Docket Sheet from <i>United States ex rel. Gray v. Mitias Orthopaedics, PLLC</i>, No. 3:15-cv-00127 (N.D. Miss.) |
| Exhibit 2 | PACER Docket Sheet from <i>United States v. Performance Accounts Receivable, LLC</i>, No. 1:16-cv-00038 (S.D. Miss.) |
| Exhibit 3 | Declaration of Cliff Johnson |
| Exhibit 4 | Vague Entries in the Akin Firm’s Invoices |
| Exhibit 5 | Vague Entries in the Mitchell McNutt Firm’s Invoices |

- Exhibit 6** **Entries from the Akin and Mitchell McNutt Firms' Invoices Showing Duplicative Deposition Coverage**
- Exhibit 7** **Entries from the Akin Firm's Invoices Associated with Timekeepers Who Are Not Described in the Salcido Affidavit or Defendants' Brief**
- Exhibit 8** **Entries from the Akin and Mitchell McNutt Firms' Invoices Showing Excessive, Unnecessary, and Redundant Hours**
- Exhibit 9** **Excerpts from Robert Salcido's False Claims Act Treatise and Defendants' Litigation Briefs Related to Relator's Common Law Claims**
- Exhibit 10** **Excerpts from Robert Salcido's False Claims Act Treatise and Defendants' Litigation Briefs Related to Defendants' Argument that Nurse Licensure Violations Do Not Affect the Per Diem Payment Rate**
- Exhibit 11** **Entries from the Akin Firm's Invoices Associated with Research**
- Exhibit 12** **Entries from the Akin Firm's Invoices Associated with Drafting Briefs, Pleadings, and Other Documents**
- Exhibit 13** **October 29, 2020, Correspondence from Relator's Counsel Serving Defendants with 30(b)(6) Depositions Notices**
- Exhibit 14** **Excerpts from Transcript of Almefty 30(b)(6) Deposition**

The Relator is also filing a Memorandum in Support of This Response.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of May, 2023, the following counsel were served by operation of the Court's electronic filing system:

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